

THE TUROCI FIRM

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Attorney for Debtor

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
RIVERSIDE DIVISION**

In re:

LINCOLN JAMES INVESTMENT
PROPERTIES, LLC,

Debtor and Debtor in Possession.

Chapter 11
Case No. 6:17-bk-17285WJ

**REPLY TO UNITED STATES
TRUSTEE'S OBJECTION TO
DEBTOR'S MOTION FOR AUTHORITY
TO EMPLOY THE TUROCI FIRM AS
GENERAL BANKRUPTCY COUNSEL**

Date: 11/14/2017
Time: 1:00 PM.
Ct. No.: 304
Place: United States Bankruptcy Court
Central District
3420 Twelfth Street
Riverside, CA 92501

**TO THE HONORABLE WAYNE JOHNSON, UNITED STATES BANKRUPTCY
JUDGE; THE OFFICE OF THE UNITED STATES TRUSTEE; and all other interested
parties:**

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REPLY TO UNITED STATES TRUSTEE'S OBJECTION TO DEBTOR'S MOTION FOR AUTHORITY TO EMPLOY
THE TUROCI FIRM AS GENERAL BANKRUPTCY COUNSEL

1 **LINCOLN JAMES INVESTMENT PROPERTIES, LLC**, Debtor and Debtor in
2 Possession herein (“Debtor”), for the Chapter 11 estate in the above-captioned bankruptcy case,
3 by and through its counsel files this Reply to United States Trustee’s Objection to Debtor’s
4 Motion for Authority to Employ the Turoci Firm as General Bankruptcy Counsel:

5 Applicant waives the personal guarantee of Jared and Victoria Scarth in retainer
6 agreement and the subsequent provision in paragraph 15 of the employment application.

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9 Dated: November 02, 2017

THE TUROCI FIRM

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11 By: 

Todd Turoci
Attorney for Debtor in Possession
Lincoln James Investment
Properties, LLC.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
3845 10th Street, Riverside, CA 92501

A true and correct copy of the foregoing document described) **REPLY TO UNITED STATES TRUSTEE'S
OBJECTION TO DEBTOR'S MOTION TO EMPLOY THE TUROCI FIRM AS GENERAL
BANKRUPTCY COUNSEL** served or was served (a) on the judge in chambers in the form and manner required by
LBR 5005-2(d); and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF") – Pursuant to controlling General
Order(s) and Local Bankruptcy Rule(s) ("LBR"), the foregoing document will be served by the court via NEF and hyperlink
to the document. On **11/02/2017**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and
determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email
address(es) indicated below:

- Candace Carlyon ccarlyon@clarkhill.com, Crobertson@clarkhill.com; nrodriguez@clarkhill.com
- Everett L Green everett.l.green@usdoj.gov
- Richard A Rogan rrogan@jmbm.com, jb8@jmbm.com; to1@jmbm.com
- Todd L Turoci mail@theturocifirm.com
- United States Trustee (RS) ustpreion16.rs.ecf@usdoj.gov

☐ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):

On **11/02/2017** I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or
adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class,
postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration
that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Honorable Wayne Johnson
United States Bankruptcy Court
3420 Twelfth Street, Ste 384 Ctrm. 304
Riverside, CA 92501

☐ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL (indicate method for each person or
entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following person(s) and/or entity(ies)
by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email
as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later
than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true
and correct.

11/02/2017
Date

Dana Cormey
Type Name

/s/ Dana Cormey
Signature